

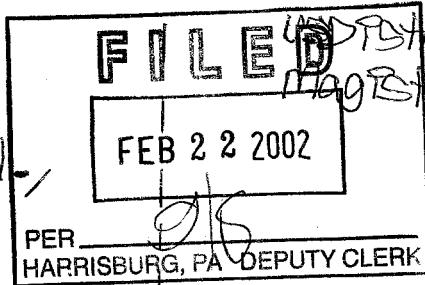
IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN RICHARD JAE,
Plaintiff,
vs.

KENNETH D. KYLER, et al.,
Defendants.

CRIM No. 1:CR-00-0315

166
2/25/02
SC



UPSTAIRS JUDGE Rambow
Magistrate Judge Smyser

MOTION FOR ENLARGEMENT OF TIME

COMES Now, the Plaintiff Pro se counsel, John Richard Jae, as a Layman Unlettered in the Arts & Sciences of the Laws & Legal Procedures within the United States, pursuant to Fed. R. Crv. P. 6(b), and now files his Motion for Enlargement of Time, herein the above-captioned case, & who avers, deposes & states

1. That, on February 6, 2002, U.S. Magistrate Judge J. Andrew Smyser, of this Court, filed his Report And Recommendation, herein this case.

2. That, due to the fact that the Plaintiff has not yet completed his necessary legal research and investigation that he needs to do in order to enable him to prepare & file & serve his Plaintiff's written objections to the U.S. Magistrate Judge's Report And Recommendation herein this case nor has he yet had the time to make the necessary copies of such document, the Plaintiff is unable to prepare, file & serve his written objections to the U.S. Magistrate Judge's Report And Recommendation of February 6, 2002, by the due date for such of February 19, 2002, & he requests an enlargement of time of (2) twenty-one days to & including March 11, 2002, in which to prepare, file & serve his Plaintiff's written objections to the U.S. Magistrate Judge's Report And Recommendation of February 6, 2002, herein this case.

3. That, this short period of enlargement of time will not prejudice Defendants nor unduly delay the proceedings, herein this case.

(u) HEREFORE, Plaintiff John Richard Jae, prays that the Court will grant him the requested enlargement of time in full, herein this case.

AND HE SHALL EVER PRAY
RESPECTFULLY SUBMITTED

(s) John Richard Jae
MRS. JOHN RICHARD JAE, #166-3
SCT. GREENE, SMY
775 PENNSA. RD. PMB 2000
PAVINGDALE, PA 17048-2000

Dated: 18th FEBRUARY 2002

State v. B. Kyler, et al.
CIVIL No. 1-SC-00-0315
CERTIFICATE OF SERVICE

I certify under penalty of perjury that on 2/19/02, I mailed to the person listed below, a true and correct copy of the within Motion for Enlargement of Time, by way of U.S. AIR MAIL, postage pre paid & addressed to:

MR. Michael L. Harvey, SDAG
Office of the Attorney General of Pennsylvania
15th Floor - Strawberry Square
Harrisburg, PA. 17120

I certify under penalty of perjury that on 2/19/02, I gave Prison Officials here for mailing to this court, the original of the above-same document:

Dated/Executed on:
19th FEBRUARY 2002:
At: Waynesburg, Pennsylvania

(S) — John Richard
MR. JOHN RICHARD
#BQ-3219
OCT- Greene/sml
175 Progress Dr.
Waynesburg, PA. 15370
Plaintiff and his Special

From the Desk of:
MR. JOHN RICHARD JR.,
#BQ-2219
SCI-Greene/SMU
175 Progress Drive
Waynesburg, PA 15370-0009
February 19, 2002

To: OFFICE OF THE CLERK
U.S. DISTRICT COURT
228 Walnut Street
P.O. Box 983
Harrisburg, PA 17108-0983

Re: JRC vs. Tyler, et al.
CRIM No. 1:CR-00-0215

DEAR CLERK:

Please file the enclosed Plaintiff's Motion for Enrich
of Time in the above-captioned Civil Rights Action:

Also, please be advised that Plaintiff's current address
of record is as listed above and that all court orders, etc.
shall now be forwarded to this Plaintiff's at such address.

Sincerely,

(S) John Richard Jr.
MR. JOHN RICHARD JR.,
Plaintiff and his Consol.

CC: MR. Michael L. Harvey DAG,
WPA/END.